

February 26, 2004

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Federal Register Vol. 68, No. 237, pg. 68859, December 10, 2003 Docket Number FV-04-301

The Asociación de Productores de Hortalizas en Invernadero (AMPHI) endorses the efforts of the U.S. Department of Agriculture to modernize the U.S. standards for grades of greenhouse tomatoes as proposed in the Federal Register. The classification of defects by count instead of by weight should speed the inspection process for greenhouse tomatoes. However, the proposal to use circumference as the basis to establish sizes may work against the efforts to speed the inspection process and create significant weight differences in product using the current industry standard sized box.

AMPHI is the trade association representing growers of greenhouse tomatoes grown in Mexico. AMPHI currently has membership of growers in virtually all the important greenhouse growing regions throughout Mexico.

It is our understanding from our meeting with David Priester at the recent North American Tomato Trade Working Group meetings that the deadline for comments relating to the standard was delayed. This delay has allowed us to develop a more complete response to the USDA notice. We appreciate your consideration and acceptance of our comments.

AMPHI supports the move from calculated percentage of defects based on the weight of each tomato in the lot with a defect to a system based on the count of tomatoes within the lot with the defect. AMPHI agrees that this change would significantly speed the inspection process for greenhouse tomatoes with no change to the integrity of the inspection process.

AMPHI is concerned with the proposal to use circumference as the method to determine size for the grade standard. Variations in varieties of greenhouse tomatoes produce tomatoes that

are relatively taller and thinner as well as some varieties that are shorter and wider. The industry is relatively standardized in using a net 15-pound one-layer pack for beefsteak tomatoes that uses a count methodology to define size. AMPHI suggests that the USDA investigate the possibility of using a count size as a basis for determining size, since measuring circumferences would once again slow the process of inspections and might lead to even less standardization within the industry regarding size than exists today.

AMPHI is also opposed to any efforts to limit the term "greenhouse" based only on the technology package used by a particular group of growers. The industry continues to evolve in Mexico as growers and researchers are adapting technologies to the specific growing conditions such as temperature, humidity, day length, etc. found in the diverse growing areas in Mexico. Artificially limiting progress to increase the efficiency of the industry would be a mistake.

AMPHI also would like to ensure that the standard is not written in such a way to discourage the innovative use of packaging in marketing greenhouse tomatoes. Just as production technology has changed over the years, so have consumer and retailer demands for new styles of presentation and packaging. AMPHI would be opposed to any efforts to limit the grades to only a limited number of box dimensions or pack styles.

AMPHI encourage USDA to reexamine destination tolerances during it modernization of the grade standard. Given that greenhouse tomatoes are still ultimately perishable vegetables, AMPHI believes that USDA should investigate if time and distance to the delivery point from the shipping point should be similar to those for virtually all other fruit and vegetable standards enforced by USDA.

AMPHI stands ready to assist the USDA in coordinating information to and from the Mexican greenhouse tomato producers, who are a main supplier of this product to the United States. In addition, the current greenhouse standards have useful commercial applicability to traditional beefsteak round tomatoes. AMPHI is willing to work with USDA to see if additional information could be included in the standard to make it more useful for other varieties of greenhouse tomatoes such as tomatoes-on-the-vine, roma, cherry, grape, and "heirloom" tomatoes that would not be appropriate to be graded against the standard in its current format.

Thank you for accepting the participation of AMPHI in this process.

Sincerely,

Ing. Jesús F. Molina Ruibal President

Asociación Mexicana de Productores de Hortalizas en Invernadero